

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)
)
Plaintiff,) CRIMINAL NO. 06-30044-WDS
)
vs.) Title 18
) United States Code,
RYAN A. SEIB,) Sections 2252A(a)(2)(b),
) and 2252A(a)(5)(B).
Defendant.)

FILED

MAR 22 2006

INDICTMENT

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

THE GRAND JURY CHARGES:

1. In 2003, the Bureau of Immigration and Customs Enforcement identified credit card holders who were subscribers to a child pornography website. **RYAN SEIB** was identified as a subscriber who resided within the Southern District of Illinois and, in 2004, his name and address were provided to the United States Postal Inspection Service in Saint Louis, Missouri.

2. The Saint Louis Postal Inspector coordinated with the Postal Inspection Service in Atlanta, Georgia, which ran an undercover fictitious company that purported to be a distributor of child pornography. In February of 2005, the undercover company mailed to **RYAN SEIB** an advertisement offering both adult and child pornography pictures and videos. Accompanying the advertisement was a questionnaire asking if the recipient was interested in receiving more information about these materials. The options included checking a "No" box, indicating that the recipient was not interested in such materials and asking to be removed from the mailing list. Another option was to check a "Yes" box indicating that the recipient was interested in such materials as well as other boxes to be checked to indicate the specific types of materials in which the recipient was interested. In February of 2005, the undercover company received back the completed

questionnaire with the "Yes" box checked. Further, boxes were checked indicating an interest in receiving VHS videos, CD's, and diskettes depicting minor females, aged 9 to 17 years old, engaged in sexually explicit activity to include incest and bestiality.

3. In February and May of 2005, **RYAN SEIB** exchanged mail correspondence with the undercover company and sent the undercover company a \$40.00 money order for two VHS movies. The two movies ordered by **RYAN SEIB** were described in the mailing as follows.

DOCTOR'S APPT (PG-1)....Has A Doctor doing a thorough examination on a 10 to 12 year-old girl with his finger and dick inside her tight little wet pussy.

PAIRED UP! (PG-7)....two boys about 10 and two girls about 11 getting it on. A foursome of all around young sex.

4. In the mailings, **RYAN SEIB** provided his residential address for delivery of the tapes and his email address, thedarcoverlord@yahoo.com, as a way for the company to contact him. On June 20, 2005, the Postal Inspector sent an email to **RYAN SEIB** indicating that there had been a high volume of orders and that his shipment had been delayed. The email further inquired as to whether the customer was interested in receiving DVD's and whether the customer had a computer capable of playing DVD's. On June 27, 2005, the Postal Inspector sent an email to **RYAN SEIB** indicating that his order had been shipped on June 24, 2005 for delivery on or after June 27, 2005. No responses to these emails were ever received. It was later learned that **RYAN SEIB**'s mother, who is a local mail carrier, had learned of an investigation involving **RYAN SEIB**'s residence and had informed **RYAN SEIB** of this in late May or early June.

5. On June 28, 2005, a Postal Inspector placed the two videotapes, "Doctor's Appt" and "Paired Up!", inside a First Class Mail package. Such tapes include scenes recovered from previous

child pornography investigations and actually depict minors engaged in sexual activity. The Postal Inspector, dressed as a mail carrier, then delivered the package personally to **RYAN SEIB** at his residence. A short time later, Postal Inspectors knocked on **RYAN SEIB**'s door and identified themselves. A subsequent search located the videotapes, which had been removed from the package and placed under a blanket on **RYAN SEIB**'s bed.

6. During the June 28, 2005 search of **RYAN SEIB**'s residence, Inspectors seized a Toshiba laptop computer that **RYAN SEIB** identified as belonging to him. **RYAN SEIB** indicated that the hard drive was damaged and stated that he had not used the computer for approximately one year. Subsequent examination revealed that the hard drive was manufactured in the Philippines, with a hard drive serial number of 43BA422T. Inspectors confirmed that there had been some damage to the hard drive. Inspectors specifically identified six files stored on the hard drive that were visual depictions of minors engaged in sexually explicit conduct. Four of the six files depicted minor females performing oral sex on males. One of the six files depicted a minor in a lascivious display of her genital region. One of the six files depicted a minor female engaged in genital to genital sexual intercourse with a male.

7. During the June 28, 2005 search of **RYAN SEIB**'s residence, Inspectors seized a Hewlett Packard desktop computer that **RYAN SEIB** identified as having been shared among the other occupants of the residence, namely his father and his younger brother. Subsequent examination revealed that the hard drive was manufactured in the Philippines, with a hard drive serial number of GMT89593. Inspectors specifically identified one file stored on the hard drive which was a visual depiction of minors engaged in sexually explicit conduct. The file was entitled “_0 Kids fucking 12-14 years old.jpg.” This file depicted a minor female and minor male engaged

in genital to genital sexual intercourse. This file has been identified by the National Center for Missing and Exploited Children to depict an identified child victim. The file date associated with the graphic image was June 25, 2005. Inspectors also discovered that internet searches through America Online and Google search engines had been performed on May 25, 2005 and on June 21, 2005. These included searches for the name of the undercover company through which **RYAN SEIB** had ordered child pornography, a search utilizing the term “underage fucked-lolita.net” and a search utilizing the term “undreage (sic) lolitas.” Inspectors also located the June 20, 2005 email from the undercover company to **RYAN SEIB**’s email address, thedarcoverlord@yahoo.com.

COUNTS 1-2

Receipt of Child Pornography

Paragraphs 1 through 7 are incorporated and re-alleged as part of Counts 1 through 2.

On or about the specified dates, within St. Clair County, within the Southern District of Illinois,

RYAN A. SEIB,

defendant herein, did knowingly receive material that contains child pornography that had been mailed and shipped and transported in interstate commerce. Each such image is listed as a separate count of this Indictment.

1.	June 28, 2005 (To wit: one VHS tape labeled “DOCTOR’S APPT (PG-1)”)
2.	June 28, 2005 (To wit: one VHS tape labeled “PAIRED UP! (PG-7)”)

All in violation of Title 18, United States Code, Section 2252A(a)(2)(B).

COUNTS 3-9**Possession of Child Pornography**

Paragraphs 1 through 7 are incorporated and re-alleged as part of Counts 3 through 9.

On or about the specified dates, within St. Clair County, within the Southern District of Illinois,

RYAN A. SEIB,

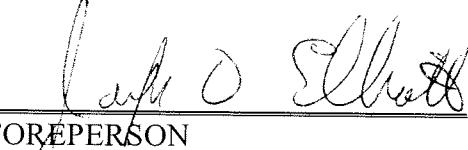
defendant herein, did knowingly possess material that contains an image of child pornography that was produced using materials that have been mailed and shipped and transported in interstate and foreign commerce. Each such image is listed as a separate count of this Indictment.

3.	June 28, 2005 (To wit: a graphic image file located on a Toshiba hard drive (SN: 43BA4422T), such image file subsequently assigned the name “146896949824.jpg”, depicting a minor female performing oral sex on a male.)
4.	June 28, 2005 (To wit: a graphic image file located on a Toshiba hard drive (SN: 43BA4422T), such image file subsequently assigned the name “14688760896.jpg”, depicting a minor female performing oral sex on a male.)
5.	June 28, 2005 (To wit: a graphic image file located on a Toshiba hard drive (SN: 43BA4422T), such image file subsequently assigned the name “14688932216.jpg”, depicting a minor female engaged in sexual intercourse with a male.)
6.	June 28, 2005 (To wit: a graphic image file located on a Toshiba hard drive (SN: 43BA4422T), such image file subsequently assigned the name “1724.jpg”, depicting a minor female exhibiting her pubic region.)
7.	June 28, 2005 (To wit: a graphic image file located on a Toshiba hard drive (SN: 43BA4422T), such image file subsequently assigned the name “2592.jpg”, depicting a minor female performing oral sex on a male.)
8.	June 28, 2005 (To wit: a graphic image file located on a Toshiba hard drive (SN: 43BA4422T), such image file subsequently assigned the name “4793.jpg”, depicting a minor female performing oral sex on a male.)

9.	June 28, 2005 (To wit: a graphic image file located on a Toshiba hard drive (SN: GMT89593), named “_0 Kids fucking 12-14 years old.jpg”, depicting a minor female and minor male engaged in sexual intercourse.)
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All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

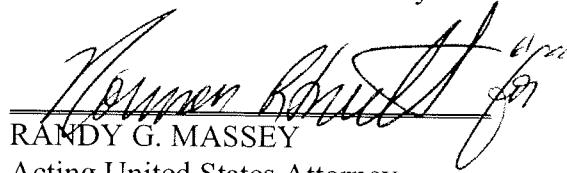
A TRUE BILL



FOREPERSON



KEVIN F. BURKE
Assistant United States Attorney



RANDY G. MASSEY
Acting United States Attorney

Recommended Bond: \$10,000.00